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September 24, 2018

BY ECF

Honorable Gary R. Brown
United States Magistrate Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

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*Also Admitted In New Jersey

Re: *Jackson v. Nassau County, et al.*, 18 CV 3007 (JS) (GRB)

Your Honor:

I represent plaintiff in the above-referenced civil rights action. I write with the consent of counsel for the Nassau County defendants to respectfully request a 30-day extension of plaintiff's service deadline under Fed. R. Civ. P. 4(m), from today until October 24, 2018.

This wrongful conviction case challenges plaintiff's prosecution and 1997 murder conviction and seeks to recover damages for the over 23 years Mr. Jackson spent incarcerated as a result. The matter was commenced on May 22, 2018. DE #1. Since that time, plaintiff has worked diligently to serve process on the substantial number of named defendants. *See* DE #9-10, 95-124. The Freeport defendants answered the complaint on August 6, 2018. DE #94. With plaintiff's consent, the Nassau County defendants sought and obtained an extension of their response deadline, with it now standing at October 5, 2018. *See* DE #125; order dated August 24, 2018.

Plaintiff has been informed that some of the named defendants who were previously employed by Nassau County are now either deceased or have whereabouts unknown to defense counsel. If it should please the Court, the proposed extension should allow time for the County to disclose the details to plaintiff and for plaintiff to locate and serve the individuals or make such other arrangements as are appropriate.

Hon. Gary R. Brown
Sept. 24, 2018

In light of the foregoing, plaintiff respectfully requests, on consent, a 30-day extension of his Fed. R. Civ. P. 4(m) service deadline, from today to October 24, 2018.

Thank you for your consideration of this request.

Respectfully submitted,

Gabriel P. Harvis

cc: All Counsel